

CONFIDENTIAL – SUBJECT TO PROTECTIVE ORDER

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION

W.K., E.H., M.M., R.P., M.B., D.P.,
A.F., C.A., R.K., K.P., and T.H.,

Plaintiffs,

v.

RED ROOF INNS, INC., FMW RRI
NC, LLC, RED ROOF
FRANCHISING, LLC, RRI WEST
MANAGEMENT, LLC, VARAHI
HOTEL, LLC, WESTMONT
HOSPITALITY GROUP, INC., and
RRI III, LLC,

Defendants.

**PL Sum. J.
Ex. 071**

CIVIL ACTION FILE

NO. 1:20-cv-5263-MHC

JURY TRIAL DEMANDED

Pursuant to Fed. R. Civ. P. 38

**PLAINTIFF D.P.’S OBJECTIONS AND RESPONSES TO
DEFENDANT RED ROOF INNS, INC.’S FIRST INTERROGATORIES**

Plaintiff D.P. (“D.P.” or “Plaintiff”) hereby provides objections and responses to Defendant Red Roof Inns, Inc.’s First Interrogatories (the “Interrogatories”). Plaintiff reserves the right to amend and supplement these responses as discovery progresses. Plaintiff states that, in these responses, she provides the identity of Victims of Sex Trafficking only subject to the Court’s June 4, 2021 Protective Order (Doc. 74). Under this Order, during the pre-trial proceedings in this litigation and in any public filings,

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previous boyfriend. At some point, while D.P. was at a Roadway Inn, she tried meth and had a bad reaction. She ran into Mr. [REDACTED] at that time, and the two went back to her hotel room. Soon after that, Mr. [REDACTED] made D.P. think that he was her boyfriend, but he was very violent with her and others around her. For example, once while D.P. was staying at the Motel 6 on Delk Road, Mr. [REDACTED] tried to buy drugs from Mr. Cannon, who is the father of D.P.'s son. Mr. [REDACTED] and Mr. [REDACTED] got into a fight. He also once pistol-whipped D.P. while staying at the Motel Six.

Mr. Williams trafficked D.P. at the Red Roof Inn in Smyrna as many as five different times in 2017. Mr. [REDACTED] would sometimes have D.P. use her real name to rent rooms at this hotel, but he also used other people (including drug addicts) to rent the room in their names. D.P. would typically see up to ten clients in a day at this hotel.

Mr. [REDACTED] always stayed close to D.P. to keep an eye on her. For example, while D.P. was seeing buyers for Mr. [REDACTED] Mr. [REDACTED] often went to the stairs, hallways, or a nearby Waffle House or Master's Inn. He was violent with D.P., including engaging in fist fights with her at this hotel. And Mr. [REDACTED] would take all the money D.P. collected and often use it to buy drugs.

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She was arrested at this hotel on August 28, 2017. On that day, a police officer came to her hotel room presumably because he smelled marijuana. The police officer asked for D.P.'s identification, and when he ran it in his system, he learned that D.P. had an outstanding warrant, so he arrested her. D.P. was also arrested by Marietta police for robbery after she took something from someone at this hotel. On that occasion, Mr. [REDACTED] was at a nearby Waffle House and could see the arrest. The police asked D.P. about Mr. [REDACTED] and whether he was selling her for commercial sex, but D.P. was too afraid to tell them the truth.

D.P. also recalls one incident when she and Mr. [REDACTED] were having an argument at the Smyrna Red Roof Inn and a security guard at the hotel came to the room. The security guard said he was an "ex-cop" and he warned them to "be careful with the fighting" or "the real cops" would come. Fights like this were not uncommon at this hotel.

D.P.'s longest stay at the Red Roof Inn in Smyrna was one week and her shortest stay was two days.

While at the Smyrna Red Roof Inn, D.P. interacted with front desk employees, though she does not recall their names. She does recall that the employees knew Mr. [REDACTED] by his Facebook name, "Trap." Other victims

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VERIFICATION

The answers set forth in **PLAINTIFF D.P.'S OBJECTIONS AND RESPONSES TO DEFENDANT RED ROOF INNS, INC.'S FIRST INTERROGATORIES** are true and correct to the best of my knowledge, information and belief based on the information currently available to me. I reserve the right to make changes to these Objections and Responses if it appears that an error or omission has been made therein or if more information becomes available.

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I hereby verify, pursuant to 28 U.S.C. § 1746 and subject to penalty of perjury that the factual information contained in the foregoing responses to interrogatories is true and correct to the best of my knowledge, information and belief.

This ____ day of August, 2021.

DocuSigned by:

D.P. _____
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